

National Aeronautics and
Space Administration
Headquarters
Washington, DC 20546-0001



August 28, 2006

Reply to Attn of Environmental Management Division

Mr. Horst Greczmiel
Associate Director
National Environmental Policy Act Oversight
722 Jackson Place, NW
Washington, DC 20503

Dear Mr. Greczmiel:

The National Aeronautics and Space Administration (NASA) is pleased to respond to the Notice and Request for Comments on the proposed guide for "Aligning the Complementary Process of Environmental Management Systems and the National Environmental Policy Act" (EMS-NEPA Guide) issued by the Council on Environmental Quality in the Federal Register dated July 17, 2006. Overall, NASA believes the EMS-NEPA Guide provides an excellent tool for supporting and implementing both EMS and NEPA requirements. NASA concurs that the EMS can provide a good framework for implementing, tracking and monitoring commitments and mitigation measures established by NEPA decision documents.

NASA is concerned that the EMS alone may not satisfy the NEPA requirements for communicating and involving the interested public. While the EMS requires that procedures be established for internal and external communication, it allows a lot of flexibility in those procedures which may not meet some of the more structured NEPA requirements for public notices, solicitations for comments, and public meetings. The EMS would need to clearly incorporate the NEPA communication process. Once incorporated, NASA concurs the EMS can provide an excellent tool to monitor implementation of the NEPA communication requirements and follow-up actions and commitments resulting from public input.

If you have any questions, please contact James S. Leatherwood, Director, Environmental Management Division, by e-mail at <james.leatherwood-1@nasa.gov> or by phone at 202-358- 0230.

Sincerely,

A handwritten signature in black ink, appearing to read "Olga M. Dominguez".

Olga M. Dominguez
Assistant Administrator for
Infrastructure and Administration